

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

FEDEX SUPPLY CHAIN LOGISTICS &	§	
ELECTRONICS, INC.,	§	
Plaintiff,	§	
v.	§	
	§	
JAMES E. GOODMAN, JR., JOHN	§	
GOODMAN, JONATHAN GOODMAN,	§	
JAKE GOODMAN, JOSEPH “JODY”	§	
GOODMAN, JAMES FRINZI, SHALOM	§	
AUERBACH, NEIL AUERBACH, STEVEN	§	
ZAKHARYAYEV, EVALINA	§	
PINKHASOVA, GENESIS NETWORKS	§	
TELECOM SERVICES, LLC, GNET ATC,	§	
LLC, GREATER TECH HOLDINGS, INC.	§	Civil Action No. 3:23-cv-02397-S
f/k/a) GOODMAN TELECOM HOLDINGS,	§	
LLC,) GOODMAN INVESTMENT	§	
HOLDINGS, LLC, UNIFIED FIELD	§	
SERVICES, INC., AMERICAN METALS	§	
RECOVERY AND RECYCLING, INC. a/k/a	§	
MBG HOLDINGS, INC., MULTIBAND	§	
FIELD SERVICES, INC., HSB HOLDINGS,	§	
LLC f/k/a MULTIBAND GLOBAL	§	
RESOURCES, LLC, AMR RESOURCES,	§	
LLC, HUDSON CLEAN ENERGY	§	
ENTERPRISES, LLC, 18920 NW 11th ,	§	
LLC, PROSPERITY BANCSHARES, INC.,	§	
THE FRINZI FAMILY TRUST,	§	
ALLIANCE TEXAS HOLDINGS, LLC,	§	
AUERBACH PARTNERS, LP, and	§	
ONEPATH SYSTEMS, LLC,	§	
Defendants.	§	

UNOPPOSED MOTION TO EXTEND RESPONSE DEADLINE
FOR GNET ATC, LLC AND MULTIBAND FIELD SERVICES, INC.

TO THE HONORABLE KAREN GREN SCHOLER, UNITED STATES DISTRICT JUDGE:

GNET ATC, LLC and MULTIBAND FIELD SERVICES, INC. (together, the “Subject Defendants”) file this *Unopposed Motion to Extend Response Deadline* and would respectfully show as follows:

FedEx Supply Chain Logistics & Electronics, Inc. (the “Plaintiff”) commenced this action against the Subject Defendants and numerous other defendants by filing its *Complaint* in this Court on October 27, 2023 [Dkt. No. 1].

A related proceeding between Scott M. Seidel, Trustee (the “Trustee”), the trustee of Goodman Networks, Inc., on the one hand, and the Plaintiff, on the other hand, is pending as Case No. 23-03091-mvl (the “Adversary Proceeding”) before the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (the “Bankruptcy Court”).

In the Adversary Proceeding, the Trustee is seeking a preliminary injunction through the *Trustee’s Motion for Preliminary Injunction* (the “PI Motion”).

The Subject Defendants respectfully request an extension of the deadline for them to file an answer, motion, or other document in response to the Complaint to a date forty-five (45) days after the Bankruptcy Court enters a final order adjudicating the PI Motion.

WHEREFORE, PREMISES CONSIDERED, the Subject Defendants request that this Court enter an order extending the deadline for them to file an answer, motion, or other document in response to the Complaint to a date forty-five (45) days after the Bankruptcy Court enters a final order adjudicating the PI Motion.

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Respectfully submitted,

QUILLING, SELANDER, LOWNDS,
WINSLETT & MOSER, P.C.
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(214) 871-2100 (Telephone)
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By: /s/ Joshua L. Shepherd
Michael J. Quilling
Texas Bar No. 16432300
Joshua L. Shepherd
Texas Bar No. 24058104

ATTORNEYS FOR THE TRUSTEE ON BEHALF
OF THE SUBJECT DEFENDANTS

CERTIFICATE OF CONFERENCE

This is to certify that prior to filing this Motion, I conferred with Daniel W. Van Horn, counsel for the Plaintiff, who stated that the Plaintiff does not oppose the relief requested in this Motion. Therefore, this Motion is unopposed.

/s/ Joshua L. Shepherd
Joshua L. Shepherd

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served concurrently with the filing of the same via the Court's CM/ECF noticing system upon all persons who have filed ECF appearances in this case, including counsel of record for the Plaintiff.

/s/ Joshua L. Shepherd
Joshua L. Shepherd